

1 MCGREGOR W. SCOTT
2 United States Attorney
3 KYMBERLY A. SMITH
4 Assistant U.S. Attorney
5 501 "I" Street, Suite 10-100
6 Sacramento, California 95814
7 Telephone: (916) 554-2700

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA

10
11 UNITED STATES OF AMERICA,)
12 Plaintiff,) 2:04-cr-0357 MCE
13 v.) [PROPOSED] **STIPULATION AND ORDER**
14) DATE: August 1, 2006
15 RICHIE MISHAL,) TIME: 8:30 a.m.
16 FAISAL RASHID,) CTRM: Hon. Morrison C. England, Jr.
17 PAMELA MOLNER, and,)
HASUNI KAHWAJI,)
Defendants.)
18 _____)

19 The United States of America, through its counsels of record,
20 McGregor W. Scott, United States Attorney for the Eastern District
21 of California, and Kymberly A. Smith, Assistant United States
22 Attorney, and defendants, by and through their counsels of record,
stipulate and agree to the following revised motion schedule:

23 1. Government's response to defendants' motion to suppress
evidence to be filed on June 26, 2006;

24 2. Defendants' reply, if any, to be filed by July 24, 2006;
and

25 3. Hearing on the motion August 1, 2006, at 8:30 a.m.

26 The government needs additional time to research and prepare
27 its response to the defendants' motion. Accordingly, the parties
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1 stipulate that time be excluded for the pendency of this motion
2 pursuant to 18 U.S.C. § 3161(h)(8)(B)(ii) and Local Codes T2 and T4,
3 to allow reasonable time for counsel to effectively prepare and
4 respond to the motions.

5 Respectfully submitted,

6 McGREGOR W. SCOTT
7 United States Attorney

8 Dated: June 9, 2006

9 By: /s/ Kymberly A. Smith
10 KYMBERLY A. SMITH
11 Assistant U.S. Attorney
12 Attorneys for Plaintiff

13 Dated: June 9, 2006

14 By: /s/ Kymberly A. Smith for
15 Clyde M. Blackmon
16 CLYDE M. BLACKMON, Attorney
17 for Defendant Faisal Rashid

18 Dated: June 9, 2006

19 By: /s/ Kymberly A. Smith for
20 David Dratman
21 DAVID DRATMAN, Attorney
22 for Defendant Richie Mishal

23 Dated: June 9, 2006

24 By: /s/ Kymberly A. Smith for
25 Hayes Gable
26 HAYES GABLE, Attorney
27 for Defendant Richie Mishal

28 Dated: June 9, 2006

29 By: /s/ Kymberly A. Smith for
30 Mark Waecker
31 MARK WAECKER, Attorney
32 for Defendant Hasuni Kahwaji

33 Dated: June 9, 2006

34 By: /s/ Kymberly A. Smith for
35 Alan Baum
36 ALAN BAUM, Attorney
37 for Defendant Pamela Molner

38 **ORDER**

39 The briefing schedule proposed by the parties is adopted, and
40 time is excluded under the Speedy Trial Act from July 18, 2006 to

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1 and including August 1, 2006, pursuant to 18 U.S.C. § 3161 and Local
2 Codes T2 and T-4.

3 **IT IS SO ORDERED.**

4 DATED: June 12, 2006

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8 MORRISON C. ENGLAND, JR.
9 UNITED STATES DISTRICT JUDGE

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